

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

In re: Michael Anthony Burns  
Jessica Key Burns

Case No. 11-61803

Chapter 7

Debtor(s)

**MOTION FOR TURNOVER ORDER**

Comes now William F. Schneider, Trustee in the above-styled case, and moves the Court for the entry of an order requiring the debtors to turn over to the Trustee within ten (10) days of the date of the entry of this Court's order (1) the surrender value estimated to be \$4,335.00 of Michael Burns' Jackson National life insurance policy #0003982915; (2) the surrender value estimated to be \$970.75 of Jessica Burns' Jackson National life insurance policy #0003982916; (3) a copy of First Citizens Bank checking account statement for account no. xxx4984 showing the account balance on July 18, 2011 and all funds in the account on that date.

The Trustee also requests 1) copies of the debtors 2010 federal and Virginia income tax returns as soon as they are filed and any refunds which they may be entitled to receive for 2010; and 2) a pro-rated share (54.28%) of any 2011 tax refunds which the Debtors may be entitled to receive.

Respectfully submitted,

Dated: October 14, 2011

/s/ William F. Schneider  
William F. Schneider, Trustee  
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